

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

In re: City of Detroit, Michigan, Debtor.	Bankruptcy Case No. 13-53846 Judge Thomas J. Tucker Chapter 9
---	---

**STIPULATION FOR ORDER GRANTING BRIEF FURTHER
EXTENSION OF TIME FOR PARTIES TO FILE JOINT MOTION
MEMORALINZING AND SEEKING APPROVAL OF THEIR
SETTLEMENT REGARDING HEARING ON CITY OF DETROIT'S
OBJECTION TO CLAIM NUMBER 1862 FILED BY
DETROIT POLICE OFFICERS' ASSOCIATION**

The City of Detroit, Michigan (“City”) and the Detroit Police Officers Association (“DPOA”), by their undersigned counsel, hereby stipulate and agree as follows:

1. On October 29, 2019, the City filed the *City of Detroit's Objection to Claim Number 1862 Filed by Detroit Police Officers' Association* [Doc. No. 13152] (“Objection”).
2. On December 11, 2019, the DPOA filed a response to the Objection. [Doc. No. 13193].
3. The Court conducted a hearing on the Objection on February 12, 2020.
4. The Court scheduled a further hearing on the Objection, for the purpose of issuing an oral bench opinion, on March 25, 2020.

5. On March 24, 2020, the hearing was adjourned to April 29, 2020. [Doc. No. 13273].

6. On April 8, 2020, the parties filed a stipulation requesting that the Court adjourn the April 29 hearing until May 27, 2020. The Court then entered an order adjourning the hearing until May 27, 2020 and converting the hearing into a status conference. [Doc. No. 13277].

7. On May 26, the parties filed a stipulation requesting an adjournment of the status conference for 30 days. [Doc. No. 13288]. The Court entered an order approving the stipulation, which adjourned the status conference to July 1. [Doc. No. 13289].

8. This matter has been settled and the parties have been working together to finalize settlement documents, subject to this Court's approval. This Court last held a status conference on December 16, 2020. At that time, pursuant to a minute entry, the Court, after consulting with the parties, indicated that the joint motion seeking approval should be filed no later than January 15, 2021.

9. The parties filed an Ex Parte Motion seeking to seal one of the exhibits to the joint motion on January 15, 2021 [Docket No. 13328]. The DPOA has retained a broker, a claims administrator and is in the process of retaining a fiduciary to assist in the monetization of the settled claim.

10. The parties now seek a brief, additional extension of the time to file the joint motion from Friday, January 15, 2021 until Friday, January 29, 2021. Distribution to Class 14 claimants is not imminent, and this brief, further extension will not prejudice the parties or other Class 14 claimants.

11. WHEREFORE, the City and the DPOA respectfully request that the Court enter an order in substantially the same form as the one attached as Exhibit 1 setting the deadline for the parties to file the joint motion memorializing and seeking approval of the settlement and proposed distribution process until Friday, January 29, 2021.

STIPULATED AND AGREED TO ON January 15, 2021:

By: /s/ Barbara A. Patek
Barbara A. Patek, Esq.
Attorney for Creditor – DPOA
24 E. Flint Street, Suite 2
Lake Orion, MI 48362
(248) 814-9470
pateklaw@gmail.com

By: /s/ Marc N. Swanson
Marc N. Swanson (P71149)
Attorney for Debtor – City of Detroit
150 West Jefferson, Suite 2500
Detroit, MI 48226
(313) 496-7591
swansonm@millercanfield.com

EXHIBIT 1

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

In re: City of Detroit, Michigan, Debtor.	Bankruptcy Case No. 13-53846 Judge Thomas J. Tucker Chapter 9
---	---

**ORDER GRANTING FURTHER EXTENSION OF TIME FOR PARTIES
TO FILE JOINT MOTION MEMORIALIZING AND SEEKING
APPROVAL OF THEIR SETTLEMENT REGARDING HEARING ON
CITY OF DETROIT'S OBJECTION TO CLAIM NUMBER 1862 FILED BY
DETROIT POLICE OFFICERS' ASSOCIATION**

Upon the *Stipulation for Order Granting Further Extension of Time for Parties to File Joint Motion Memorializing and Seeking Approval of their Settlement Regarding Hearing on City of Detroit's Objection to Claim Number 1862 Filed by Detroit Police Officers' Association* (Docket # _____, the "Stipulation")¹; the Court finds good cause to enter this Order.

IT IS ORDERED that the deadline for the parties to file their joint motion memorializing and seeking approval of their settlement is extended from Friday, January 15, 2021 until Friday, January 29, 2021.

¹ Capitalized terms not otherwise defined in this Order shall have the meanings ascribed to them in the Stipulation.